



WESTERN
MUNICIPAL
WATER
DISTRICT

6/26/07 Scoping Mtg.
CA Ocean Plan Amend.
Deadline: 7/27/07 Noon

John V. Rossi
General Manager

July 24, 2007

Charles D. Field
Division 1

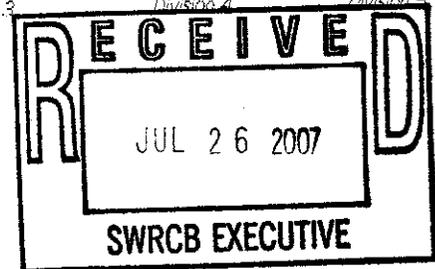
Thomas P. Evans
Division 2

Brenda A. Dennstedt
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Donald D. Galleano
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Song Her, Clerk to the Board
Executive Office, Division of Water Quality
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



**Re: California Ocean Plan Amendments: Recommend Support for Alternative 1 on Issue 10 –
Desalination Facilities and Brine Disposal**

Western Municipal Water District (Western) respectfully wishes to convey comments on the proposed amendments to the California Ocean Plan (COP). Western's comments and concerns focus on Issue 10, *Desalination Facilities and Brine Disposal*, with recommendation to support Alternative 1.

Western provides water, wastewater, recycled water, and water resource management services to more than 800,000 residents in our rapidly growing service area located in western Riverside County. While Western's service area is located some 40 miles inland, the COP poses potential direct impacts on our operations, particularly Western's Integrated Regional Watershed Management Plan calling for expansion of local water supply from recycled water and desalination of brackish groundwater.

Desalination of brackish groundwater currently provides more than 60 percent of the drinking water needs of one of Western's wholesale customers (city of Norco), and Western is looking to invest millions of dollars to expand desalination -- up to 20 million gallons per day -- to meet demand in other communities. In addition to providing critical uninterrupted local water supply in lieu of imported water from the drought-stricken Colorado River, and the environmentally sensitive Bay-Delta, desalination of brackish groundwater enhances long-term sustainability for our region by improving long term groundwater quality.

Western is partnering with neighboring water agencies to develop brackish groundwater desalination facilities capable of generating up to 20,000 acre-feet of brine each year (assuming year-round operation at full capacity). A regional line delivers the brine to a coastal treatment plant where it is treated and ultimately safely discharged into the ocean.

This regional brine line linked to Western's desalination projects offers hydrological control of the brackish groundwater basins, preventing seepage of salts into the river. In other words, brackish groundwater treatment and safe ocean disposal protects the Santa Ana river ecosystem as well as complying with court orders to protect the drinking water quality for millions of citizens downstream.

Western's Board of Directors recognizes the regional salt management challenges and joined the New Water Supply Coalition, an organization focused on funding strategies for creation of new water supply as a result of addressing salt balance issues and removing salt from local water resources.

Page 2

Removal of salt from source water also enhances the expansion of recycled water which must meet discharge requirements, and basin plan objectives as defined in the wastewater management requirements of the Regional Water Quality Control Board Basin Plan. Removal of TDS through desalination and brineline transport allows recycled water to be applied without impairing groundwater quality. In fact, "discharges of brines and other mineralized wastewaters to SARI and the Chino Basin Non-reclaimable Line are encouraged" as stated in the RWQCB Basin Plan.

Salinity management is identified by the Santa Ana Watershed Project Authority (SAWPA) as one of the top four serious threats to long term regional water sustainability. Currently over 70 percent of the water supply in the Santa Ana Watershed comes from groundwater basins rendered undrinkable by deposits of minerals from agricultural practices and other sources.

As one of the five agencies comprising SAWPA, it is incumbent upon Western to assert a regional leadership role in voicing concern over Alternatives number 2 and 3, proposed amendments to California Ocean Plan Amendment Issue 10, *Desalination Facilities and Brine Disposal*. These provisions would negatively impact salt management, brackish groundwater desalination, and water recycling which are indispensable components of Western's balanced water supply portfolio.

Alternatives number 2 and 3 are necessary since the current California Ocean Plan provides ample provisions for the protection of the quality of the State's waters and beneficial uses of those waters. Moreover, protection of the marine environment through safe treatment and disposal of brine is already accomplished by recent improvements in the wastewater treatment standards at Orange County Sanitation District, from primary to secondary treatment levels meeting all Region 8 RWQCB ocean discharge permit requirements.

For the reasons mentioned above, **Western urges the Board to select Alternative 1 as the most positive course of action: No Action on Issue 10 - Desalination Facilities and Brine Disposal.** Alternative 1 will allow safe disposal of brine without impeding development and implementation of Western's crucial water strategies to develop long term water supply sustainability while protecting water quality and safeguarding the Santa Ana River ecosystem. Thank you for your consideration.

Sincerely,



JOHN V. ROSSI
General Manager

JVR: PR

Cc:	KP Advocates	Association of California Water Agencies
	Dolphin Group	California Association of Sanitation Agencies
	Association of Groundwater Agencies	California Groundwater Coalition
	California Special Districts Association	Jurupa Community Services District
	City of Norco	City of Ontario
	Inland Empire Utilities District	Chino Basin Watermaster
	Metropolitan Water District	Groundwater Resources Association
	Santa Ana Watershed Project Authority	Southern California Water Committee